

# GHAJAR EXHIBIT 54

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----:  
RICHARD KADREY, et al., :  
Individual and :  
Representative Plaintiffs, :  
vs. : Case No.:  
META PLATFORMS, INC., : 3:23-cv-03417-VC  
a Delaware corporation; :  
Defendant. :  
-----:

VIDEOTAPED DEPOSITION OF MATTHEW C. KLAM  
Cleary Gottlieb Steen & Hamilton, LLP  
Tuesday, December 10, 2024  
9:40 a.m.

Reported by:  
Robert M. Jakupciak, RPR  
JOB No. SF-7030273

PAGES 1 - 381

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22



REPORTER'S CERTIFICATE

I, ROBERT M. JAKUPCIAK, an RPR and  
Notary Public within and for the District of  
Columbia do hereby certify:

That the witness whose deposition is  
hereinbefore set forth, was duly sworn and that  
the within transcript is a true record of the  
testimony given by such witness.

I further certify that I am not  
related to any of these parties to this action  
by blood or marriage and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 20th day of December, 2024.



ROBERT M. JAKUPCIAK, an RPR and  
Notary Public

My Commission Expires:  
February 28, 2029

Joseph R. Saveri (State Bar No. 130064)  
 Cadio Zirpoli (State Bar No. 179108)  
 Christopher K.L. Young (State Bar No. 318371)  
 Holden Benon (State Bar No. 325847)  
 Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
 601 California Street, Suite 1505  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 Email: jsaveri@saverilawfirm.com  
 czirpoli@saverilawfirm.com  
 cyoung@saverilawfirm.com  
 hbenon@saverilawfirm.com  
 acera@saverilawfirm.com

*Counsel for Individual and Representative  
 Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
 1920 Hillhurst Avenue, 406  
 Los Angeles, CA 90027  
 Telephone: (323) 968-2632  
 Facsimile: (415) 395-9940  
 Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
 Alexander J. Sweatman (pro hac vice)  
 Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
 & SPRENGEL LLP**  
 135 South LaSalle Street  
 Suite 3210  
 Chicago, IL 60603  
 Telephone: (312)782-4880  
 Facsimile: (312)782-4485  
 Email: bclobes@caffertyclobes.com  
 asweatman@caffertyclobes.com  
 mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,  
*Individual and Representative Plaintiffs,*  
 v.  
 Meta Platforms, Inc.,  
*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-04663

**PLAINTIFF TA-NEHISI COATES'S  
 RESPONSES TO DEFENDANT META  
 PLATFORMS, INC.'S SECOND SET OF  
 REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the phrase “made public” as vague  
20 and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: [asweatman@caffertyclobes.com](mailto:asweatman@caffertyclobes.com)

Daniel J. Muller (State Bar No. 193396)  
**VENTURA HERSEY & MULLER, LLP**  
1506 Hamilton Avenue  
San Jose, California 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com)

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*



Joseph R. Saveri (State Bar No. 130064)  
 Cadio Zirpoli (State Bar No. 179108)  
 Christopher K.L. Young (State Bar No. 318371)  
 Holden Benon (State Bar No. 325847)  
 Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
 601 California Street, Suite 1505  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 Email: jsaveri@saverilawfirm.com  
 czirpoli@saverilawfirm.com  
 cyoung@saverilawfirm.com  
 hbenon@saverilawfirm.com  
 acera@saverilawfirm.com

*Counsel for Individual and Representative  
 Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
 1920 Hillhurst Avenue, 406  
 Los Angeles, CA 90027  
 Telephone: (323) 968-2632  
 Facsimile: (415) 395-9940  
 Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
 Alexander J. Sweatman (pro hac vice)  
 Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
 & SPRENGEL LLP**  
 135 South LaSalle Street  
 Suite 3210  
 Chicago, IL 60603  
 Telephone: (312)782-4880  
 Facsimile: (312)782-4485  
 Email: bclobes@caffertyclobes.com  
 asweatman@caffertyclobes.com  
 mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,  
*Individual and Representative Plaintiffs,*  
 v.  
 Meta Platforms, Inc.,  
*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-04663

**PLAINTIFF JUNOT DIAZ’S RESPONSES  
 TO DEFENDANT META PLATFORMS,  
 INC.’S SECOND SET OF REQUESTS FOR  
 ADMISSION**

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in him individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

3 Bryan L. Clobes (pro hac vice)  
4 Alexander J. Sweatman (pro hac vice)  
5 Mohammed Rathur (pro hac vice)  
6 **CAFFERTY CLOBES MERIWETHER**  
7 **& SPRENGEL LLP**  
8 135 South LaSalle Street, Suite 3210  
9 Chicago, IL 60603  
10 Telephone: (312) 782-4880  
11 Email: [asweatman@caffertyclobes.com](mailto:asweatman@caffertyclobes.com)

12 Daniel J. Muller (State Bar No. 193396)  
13 **VENTURA HERSEY & MULLER, LLP**  
14 1506 Hamilton Avenue  
15 San Jose, California 95125  
16 Telephone: (408) 512-3022  
17 Facsimile: (408) 512-3023  
18 Email: [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com)

19 *Counsel for Individual and Representative Plaintiffs*  
20 *and the Proposed Class*  
21  
22  
23  
24  
25  
26  
27  
28

Rachel Geman (*pro hac vice*)  
rgeman@lchb.com  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, NY 10013-1413  
Telephone: 212.355.9500  
Facsimile: 212.355.9592  
Email: rgeman@lchb.com

Elizabeth J. Cabraser, Esq.  
Daniel M. Hutchinson, Esq.  
Reilly T. Stoler, Esq.  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: 415.956.1000  
Email: ecabraser@lchb.com  
dhutchinson@lchb.com  
rstoler@lchb.com

Kenneth S. Byrd. (*pro hac vice* forthcoming)  
Betsy A. Sugar (*pro hac vice* forthcoming)  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
222 2nd Avenue South, Suite 1640  
Nashville, TN 37201-2375  
Telephone: 615.313.9000  
Email: kbyrd@lchb.com  
bsugar@lchb.com

Scott J. Sholder (*pro hac vice*)  
CeCe M. Cole (*pro hac vice*)  
COWAN DEBAETS ABRAHAMS & SHEPPARD LLP  
60 Broad Street, 30th Floor  
New York, New York 10004  
Telephone: 212.974.7474  
Email: ssholder@cdas.com  
ccole@cdas.com

Attorneys for Plaintiff  
*Christopher Farnsworth and*  
*Representative Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative  
Plaintiffs,

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER  
FARNSWORTH'S RESPONSES TO  
DEFENDANT'S FIRST SET OF REQUESTS  
FOR ADMISSIONS

PLAINTIFF CHRISTOPHER FARNSWORTH'S  
RESPONSES TO RFA'S, SET 1  
No. 3:23-CV-03417-VC

v.

META PLATFORMS, INC, a Delaware  
corporation,

Defendant.

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CHRISTOPHER FARNSWORTH

SET NO.: ONE

### **INTRODUCTION**

Plaintiff Christopher Farnsworth (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

### **GENERAL OBJECTIONS**

1. Plaintiff generally objects to Defendant’s definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work product doctrine, expert disclosure rules, or other applicable privileges and protections, including communications with Plaintiff’s attorneys regarding the Action.

3. Discovery in this matter is ongoing and Plaintiff reserves the right to amend, modify, or supplement these responses with subsequently discovered responsive information and to introduce and rely upon any such subsequently discovered information in this litigation.

1 that he will not admit or deny this Request, on the grounds that the information requested is not a  
2 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
3 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
4 discovering Plaintiffs' current knowledge or awareness.

5 **REQUEST FOR ADMISSION NO. 26:**

6 Admit that YOU are personally unaware of any text generated by any of Meta's Llama  
7 models that infringes YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

9 Plaintiff objects that the term "personally unaware" is vague and ambiguous. Plaintiff  
10 objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff  
11 further objects to this Request as an improper subject of a Request for Admission.

12 Subject to and without waiving these general and specific objections, Plaintiff responds  
13 that he will not admit or deny this Request, on the grounds that the information requested is not a  
14 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
15 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
16 discovering Plaintiffs' current knowledge or awareness.

17 **REQUEST FOR ADMISSION NO. 27:**

18 Admit that YOU have personally used one of Meta's Llama models.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

20 Plaintiff objects that this Request is not relevant to any claims or defenses.

21 Subject to and without waiving these general and specific objections, Plaintiff denies  
22 Request No. 27.

23 **REQUEST FOR ADMISSION NO. 28:**

24 Admit that YOU have personally used one of the ChatGPT large language models.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

26 Plaintiff objects that this Request is not relevant to any claims or defenses.

27 Subject to and without waiving these general and specific objections, Plaintiff admits  
28 Request No. 28.

**REQUEST FOR ADMISSION NO. 81:**

Admit that you are not aware of any agreements to assign rights in or to YOUR ASSERTED WORK(S) that have not already been produced in this ACTION.

**RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

Plaintiff objects that the terms “any agreements” and “assign rights in or to” are vague and ambiguous. Plaintiff further objects to this Request as compound and ambiguous, because it includes the disjunctive phrase, “in or to.” “[R]equests for admissions should not contain ‘compound, conjunctive, or disjunctive ... statements.’” *James v. Maguire Corr. Facility*, No. C 10-1795 SI PR, 2012 WL 3939343, at \*4 (N.D. Cal. Sept. 10, 2012) (*quoting U.S. ex rel. England v. Los Angeles County*, 235 F.R.D. 675, 684 (E.D. Cal. 2006)); *see also King v. Biter*, No. 115CV00414LJOSABPC, 2018 WL 339052, at \*6 (E.D. Cal. Jan. 9, 2018).

Subject to and without waiving these general and specific objections, Plaintiff admits discovery is ongoing. Plaintiff further admits that Plaintiff has produced non-privileged documents in Plaintiff’s possession, custody, or control, responsive to Meta’s requests for production regarding licensing agreements for Plaintiff’s Asserted Works. Plaintiff otherwise denies this Request.

Dated: November 18, 2024

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman

Rachel Geman

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, NY 10013-1413  
Telephone: 212.355.9500  
Facsimile: 212.355.959  
Email: rgeman@lchb.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice anticipated)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**



**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

Plaintiff, in his individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

**RESPONSE TO REQUEST NO. 26:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in his individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 27:**

Admit that each of YOUR ASSERTED WORKS have been made public.

**RESPONSE TO REQUEST NO. 27:**

Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “made public” as vague and misleading; that a work is available publicly does not mean that it is free to use without any consideration. Plaintiff admits that his Asserted Works have been made available to the public through various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff refers Meta to Plaintiff Golden’s response to RFP 12.

**REQUEST FOR ADMISSION NO. 28:**

Admit that each of YOUR ASSERTED WORKS had been made public prior to the infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323)968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (*pro hac vice anticipated*)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

135 South LaSalle Street  
Suite 3210  
Chicago, IL 60603

Telephone: (312) 782-4880

Facsimile: (312) 782-4485

Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF ANDREW SEAN GREER'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the phrase “made public” as vague  
20 and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: [asweatman@caffertyclobes.com](mailto:asweatman@caffertyclobes.com)

Daniel J. Muller (State Bar No. 193396)  
**VENTURA HERSEY & MULLER, LLP**  
1506 Hamilton Avenue  
San Jose, California 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com)

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*



Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

135 South LaSalle Street  
Suite 3210  
Chicago, IL 60603

Telephone: (312) 782-4880

Facsimile: (312) 782-4485

Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF DAVID HENRY HWANG'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**



1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
2 models. Plaintiff, in him individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in him individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff David Henry Hwang. Plaintiff further objects to the phrase “made public” as  
20 vague and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that him Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan L. Clobes  
Bryan L. Clobes

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: asweatman@caffertyclobes.com

Daniel J. Muller (State Bar No. 193396)  
**VENTURA HERSEY & MULLER, LLP**  
1506 Hamilton Avenue  
San Jose, California 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: dmuller@venturahersey.com

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice anticipated)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

Plaintiff, in his individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

**RESPONSE TO REQUEST NO. 26:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in his individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 27:**

Admit that each of YOUR ASSERTED WORKS have been made public.

**RESPONSE TO REQUEST NO. 27:**

Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “made public” as vague and misleading; that a work is available publicly does not mean that it is free to use without any consideration. Plaintiff admits that his Asserted Works have been made available to the public through various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff refers Meta to Plaintiff Kadrey’s response to RFP 12.

**REQUEST FOR ADMISSION NO. 28:**

Admit that each of YOUR ASSERTED WORKS had been made public prior to the infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323)968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice anticipated)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

135 South LaSalle Street  
Suite 3210  
Chicago, IL 60603

Telephone: (312) 782-4880

Facsimile: (312) 782-4485

Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF LAURA LIPPMAN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**



**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in her individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

3 Bryan L. Clobes (pro hac vice)  
4 Alexander J. Sweatman (pro hac vice)  
5 Mohammed A. Rathur (pro hac vice)  
6 **CAFFERTY CLOBES MERIWETHER**  
7 **& SPRENGEL LLP**  
8 135 South LaSalle Street, Suite 3210  
9 Chicago, IL 60603  
10 Telephone: (312) 782-4880  
11 Email: [asweatman@caffertyclobes.com](mailto:asweatman@caffertyclobes.com)

12 Daniel J. Muller (State Bar No. 193396)  
13 **VENTURA HERSEY & MULLER, LLP**  
14 1506 Hamilton Avenue  
15 San Jose, California 95125  
16 Telephone: (408) 512-3022  
17 Facsimile: (408) 512-3023  
18 Email: [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com)

19 *Counsel for Individual and Representative Plaintiffs*  
20 *and the Proposed Class*  
21  
22  
23  
24  
25  
26  
27  
28

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (*pro hac vice anticipated*)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models.

2 Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff Sarah Silverman. Plaintiff further objects to the phrase “made public” as vague  
20 and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by her is insufficient to enable her to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323)968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (*pro hac vice anticipated*)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

135 South LaSalle Street  
Suite 3210  
Chicago, IL 60603

Telephone: (312) 782-4880

Facsimile: (312) 782-4485

Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF RACHEL LOUISE SNYDER'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms "You" and "Your" as referring to Plaintiff Rachel Louise Snyder. Plaintiff also objects to the  
9 term "documentary evidence" as being vague and overbroad because it is not limited to the specific  
10 claims and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally  
11 unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms "You" and "Your" as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase  
20 "personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not  
28



1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
2 models. Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the phrase “made public” as  
20 vague and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

1 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the  
 2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan Clobes  
 Bryan L. Clobes

7 Bryan L. Clobes (pro hac vice)  
 8 Alexander J. Sweatman (pro hac vice)  
 9 Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER**  
**& SPRENGEL LLP**  
 10 135 South LaSalle Street, Suite 3210  
 Chicago, IL 60603  
 11 Telephone: (312) 782-4880  
 Email: asweatman@caffertyclobes.com

12 Daniel J. Muller (State Bar No. 193396)  
**VENTURA HERSEY & MULLER, LLP**  
 13 1506 Hamilton Avenue  
 San Jose, California 95125  
 14 Telephone: (408) 512-3022  
 15 Facsimile: (408) 512-3023  
 Email: dmuller@venturahersey.com

16  
 17 *Counsel for Individual and Representative Plaintiffs*  
 18 *and the Proposed Class*  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

David A. Straite (admitted *pro hac vice*)

**DiCELLO LEVITT LLP**

485 Lexington Ave., Suite 1001

New York, New York 10017

Tel.: (646) 933-1000

Fax: (646) 494-9648

*dstraite@dicellolevitt.com*

*Counsel for Plaintiffs and the Proposed*

*Class, Additional Counsel Listed Below*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,  
CHRISTOPHER GOLDEN, TA-NEHISI  
COATES, JUNOT DÍAZ, ANDREW SEAN  
GREER, DAVID HENRY HWANG,  
MATTHEW KLAM, LAURA LIPPMAN,  
RACHEL LOUISE SNYDER, JACQUELINE  
WOODSON, AND LYSA TERKEURST,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.;

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S SECOND SET OF REQUESTS  
FOR ADMISSION**

Plaintiff Lysa TerKeurst ("Plaintiff") hereby responds to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") Second Set of Requests for Admissions (the "Requests" or "RFAs").

**GENERAL OBJECTIONS**

1. Plaintiff generally objects to Defendant's definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work-product doctrine, expert

1 limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the  
2 phrase “you are personally unaware” as unintelligible. Subject to and without waiving these  
3 objections, Plaintiff admits that she is currently personally unaware of any documentary  
4 evidence demonstrating that a PERSON read text generated by any of Meta’s Llama models as a  
5 substitute for reading any of Plaintiff’s ASSERTED WORKS but denies that Plaintiff’s lack of  
6 awareness has any bearing on whether such conduct occurred or whether documentary evidence  
7 of such conduct exists. Plaintiff otherwise denies Request No. 23.

8  
9  
10 **REQUEST FOR ADMISSION NO. 24:**

11 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama  
12 models that infringes YOUR ASSERTED WORKS.

13 **RESPONSE TO REQUEST NO. 24:**

14 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
15 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
16 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
17 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff  
18 objects to the phrase “personally unaware” as unintelligible. Subject to and without waiving  
19 these objections, Plaintiff denies Request No. 24.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU have personally used one of Meta’s Llama models.

22 **RESPONSE TO REQUEST NO. 25:**

23 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
24 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
25 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
26 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff

1 further objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further  
2 objects to this Request as not relevant to any claims or defenses in this dispute since this case  
3 concerns Meta’s conduct in connection with Meta’s large language models. Subject to and  
4 without waiving these objections, Plaintiff denies Request No. 25.

5 **REQUEST FOR ADMISSION NO. 26:**

6 Admit that YOU have personally used one of the ChatGPT large language models.

7 **RESPONSE TO REQUEST NO. 26:**

8 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
9 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
10 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
11 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff  
12 objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to  
13 this Request as not relevant to any claims or defenses in this dispute since this case concerns  
14 Meta’s conduct in connection with Meta’s large language models. Subject to and without  
15 waiving these objections, Plaintiff denies Request No. 26.

16 **REQUEST FOR ADMISSION NO. 27:**

17 Admit that each of YOUR ASSERTED WORKS have been made public.

18 **RESPONSE TO REQUEST NO. 27:**

19 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for  
20 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
21 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe  
22 the term “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff further objects to the phrase  
23 “made public” as vague and misleading; that a work is available publicly does not mean that it is  
24 free to use without any consideration. Subject to and without waiving these objections, Plaintiff  
25 admits Request No. 27 to the extent that her Asserted Works have been made available to the

1  
2 Dated: August 21, 2024

By: /s/ James A. Ulwick  
Amy Keller (admitted *pro hac vice*)  
Nada Djordjevic (*pro hac vice* forthcoming)  
James A. Ulwick (admitted *pro hac vice*)  
10 North Dearborn St., Sixth Floor  
Chicago, Illinois 60602  
Tel.: (312) 214-7900  
Email: akeller@dicellolevitt.com  
ndjordjevic@dicellolevitt.com  
julwick@dicellolevitt.com

8 David A. Straite (admitted *pro hac vice*)  
485 Lexington Avenue, Suite 1001  
New York, NY 10017  
Tel. (646) 933-1000  
Email: dstraite@dicellolevitt.com

11 Brian O'Mara  
4747 Executive Drive, Suite 240  
San Diego, California 92121  
Tel.: (619) 923-3939  
Email: bomara@dicellolevitt.com

15 RMP, LLP  
Seth Haines (admitted *pro hac vice*)  
Timothy Hutchinson (admitted *pro hac vice*)  
5519 Hackett St., Suite 300  
Springdale, AK 72762  
Telephone: (479) 443-2705  
Email: shaines@rmp.law  
thutchinson@rmp.law  
lgeary@rmp.law

21 POYNTER LAW GROUP  
Scott Poynter (admitted *pro hac vice*)  
407 President Clinton Ave., Suite 201  
Little Rock, AK 72201  
Telephone: (501) 812-3943  
Email: scott@poynterlawgroup.com

25 Bryan L. Clobes (admitted *pro hac vice*)  
CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP  
205 N. Monroe Street

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

[Additional counsel on signature page]

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, 406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)

**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

135 South LaSalle Street  
Suite 3210  
Chicago, IL 60603

Telephone: (312)782-4880

Facsimile: (312)782-4485

Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com  
mrathur@caffertyclobes.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF JACQUELINE WOODSON'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28



1 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
2 models. Plaintiff, in her individual capacity, responds, deny.

3 **REQUEST FOR ADMISSION NO. 26:**

4 Admit that YOU have personally used one of the ChatGPT large language models.

5 **RESPONSE TO REQUEST NO. 26:**

6 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
7 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
8 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
9 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase  
10 “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to  
11 any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff,  
12 in her individual capacity, responds, deny.

13 **REQUEST FOR ADMISSION NO. 27:**

14 Admit that each of YOUR ASSERTED WORKS have been made public.

15 **RESPONSE TO REQUEST NO. 27:**

16 Plaintiff objects to the defined term “Your” as vague and overbroad and calling for discovery  
17 that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any  
18 person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the term “Your” as  
19 referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the phrase “made public” as vague  
20 and misleading; that a work is available publicly does not mean that it is free to use without any  
21 consideration. Plaintiff admits that her Asserted Works have been made available to the public through  
22 various licensing agreements that made copies of the Asserted Works available for a price. Plaintiff  
23 refers Meta to Plaintiff Silverman’s response to RFP 12.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that each of YOUR ASSERTED WORKS had been made public prior to the  
26 infringement alleged in the COMPLAINT.

terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by her is insufficient to enable her to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

Bryan L. Clobes (pro hac vice)  
Alexander J. Sweatman (pro hac vice)  
Mohammed Rathur (pro hac vice)  
**CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**  
135 South LaSalle Street, Suite 3210  
Chicago, IL 60603  
Telephone: (312) 782-4880  
Email: [asweatman@caffertyclobes.com](mailto:asweatman@caffertyclobes.com)

Daniel J. Muller (State Bar No. 193396)  
**VENTURA HERSEY & MULLER, LLP**  
1506 Hamilton Avenue  
San Jose, California 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: [dmuller@venturahersey.com](mailto:dmuller@venturahersey.com)

*Counsel for Individual and Representative Plaintiffs  
and the Proposed Class*